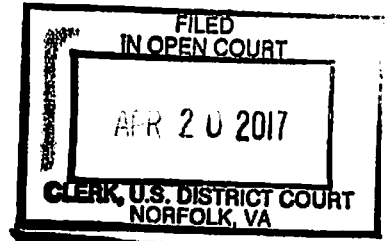


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA)
)
 v.)
)
 JEROME BONEY FRAZIER,)
 a/k/a Jerome Boney Staley,)
)
 Defendant.)
 _____)

CRIMINAL NO. 2:17cr 65
21 U.S.C §841(a)(1)
Distribution and Possession with
Intent to Distribute Heroin
(Counts 1-3)
21 U.S.C. §853 and 18 U.S.C. §924(d)
Forfeiture Allegations

INDICTMENT

April 2017 TERM - at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 2, 2017, in Suffolk, in the Eastern District of Virginia, defendant JEROME BONEY FRAZIER, did unlawfully, knowingly, and intentionally distribute approximately 28 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C))

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2017, in Portsmouth, in the Eastern District of Virginia, defendant JEROME BONEY FRAZIER, did unlawfully, knowingly, and intentionally distribute

approximately 28 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C))

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2017, in Portsmouth, in the Eastern District of Virginia, defendant JEROME BONEY FRAZIER, did unlawfully, knowingly, and intentionally distribute approximately 28 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C))

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendant, if convicted of any of the violations alleged in Counts One through three of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation;
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation; and
 - c. Any firearm or ammunition used in or involved in the violation.

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In accordance with Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d) as incorporated by Title 28, United States Code, Section 2461.)

A TRUE BILL:

/s/ Foreperson
FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By: /s/ William D. Muhr
William D. Muhr
Virginia Bar No. 30652
Assistant United States Attorney
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, VA 23510
Office Number - 757-441-6331
Facsimile Number - 757-441-6689
E-Mail Address – bill.muhr@usdoj.gov